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Loans, Inc.; U.S. Bank Trust, N.A., Trustee
For LSF9 Master Participation Trust; Summit
Real Estate Services, LLC; Joe Anderson; and
Mortgage Electronic Registration Systems, Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SILVIA REGINA LASKO, IMAM KEITH
ALAN LASKO, MOSQUE OF THE
GOLDEN RULE, and WORLDWIDE
MINISTRIES OF ISLAM,

Plaintiffs,

v.

CALIBER HOME LOANS, INC., et al.;

Defendants.

Case No.: 2:18-cv-01802-JCM-VCF

**JOINT MOTION FOR EXTENSION
OF TIME TO RESPOND TO
PLAINTIFFS' MOTIONS FOR
RECONSIDERATION (ECF NOS. 68
& 69)**

Pursuant to LR 7-1, Defendants U.S. Bank, N.A., as Trustee for LSF9 Master Participation Trust ("U.S. Bank"), Caliber Home Loans, Inc. ("Caliber"), Summit Real Estate Services, LLC ("Summit")¹, Joe Anderson, and Mortgage Electronic Registration Systems, Inc. ("MERS"), Bank of America, N.A. ("BANA"), HSBC Finance Corporation ("HSBC") and Ocwen Financial Corporation ("Ocwen," collectively, the "Defendants"), by and through their attorney, and hereby move the Court, pursuant to Rule 6 of the Federal Rules of Civil Procedure, for an extension of time to respond to Plaintiffs' Motion for Reconsideration Regarding Countrywide Home Loans and

¹ Incorrectly named Summit Financial Corp.

1 Acts of Perjury and of Fraud Upon the Court Committed by Bank of America (ECF
2 No. 68) and Plaintiffs' Motion for Reconsideration Regarding Default Entry and
3 Default Judgment Against Each of These: HSBC, OCWEN Financial Corp., Caliber
4 Home Loans, Inc. (ECF No. 69) (collectively referred to as the "Motions for
5 Reconsideration"). In support of this Joint Motion, Defendants state as follows:

6 1. Plaintiffs filed the Motions for Reconsideration on November 27, 2018.
7 (ECF Nos. 68 and 69). Defendants' responsive briefs are due on or before December
8 11, 2018.

9 2. Defendants need additional time to respond to Plaintiffs' Motions for
10 Reconsideration. The time within which to respond has not expired.

11 3. Defendants request an additional seven (7) days to respond to Plaintiffs'
12 Motions for Reconsiderations (ECF Nos. 68 and 69), up to and including December
13 18, 2018, in order to accommodate the upcoming holiday schedule, the schedule of
14 counsel and to provide the Defendants sufficient time to review and assess Plaintiffs'
15 Motions for Reconsiderations, including all supporting documentation (ECF Nos. 68
16 and 69).

17 4. This joint motion is not made for the purpose of delay, and it will not
18 prejudice the parties. The relief requested will not affect any other litigation
19 deadlines in this case.

20 MEMORANDUM

21 Rule 6(b) of the Federal Rules of Civil Procedure provides that the Court may
22 grant extensions of time at any time in its discretion for good cause shown. Where,
23 as here, the request for extension is made prior to the expiration of the specified
24 period of time, no finding of excusable neglect is required. Defendants respectfully
25 submit that good cause has been shown above for an extension of time.

26 For the foregoing reasons and authorities, Defendants respectfully request
27 that the Court grant this motion and extend Defendants' deadline to respond to
28

Plaintiffs' Motions for Reconsideration until December 18, 2018.

DATED this 4th day of December, 2018.

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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE
DATED: 12-11-2018

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 4th day of December 2018, a true and
3 correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO**
4 **RESPOND TO PLAINTIFFS' MOTIONS FOR RECONSIDERATION (ECF NOS. 68**
5 **& 69)**, was served on the following parties in the manner set forth below:

6 [XX] Via the Court's CM/ECF electronic service:

7 Darren T. Brenner, Esq.
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[XX] Via U.S. Mail, postage prepaid:

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